IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

JOHN DOE,

Plaintiff

No. 1:23-cv-12077-WGY

v.

UNIVERSITY OF MASSACHUSETTS, TRUSTEES OF THE UNIVERSITY OF MASSACHUSETTS, HANNAH MONBLEAU, in her official and individual capacities, KATE LEGEE, in her official and individual capacities, ESMERALDA LEVESQUE, a/k/a ESMERALDA Mendez, in her official and individual capacities, ADAM DUNBAR in his official and individual capacities, BRETT SOKOLOW,

Defendants

PLAINTIFF JOHN DOE'S MOTION TO PROCEED UNDER PSEUDONYM AND TO FILE HIS TRUE NAME UNDER SEAL

Plaintiff, John Doe, by and through undersigned counsel, respectfully moves this Court to allow him proceed with this action under a pseudonym, and to file his true name under seal with the Court. In support of the instant Motion, Plaintiff relies on his Complaint filed in this action, the accompanying Declaration of Ilya Feoktistov, Esq., and the accompanying memorandum of law.

WHEREFORE, Plaintiff respectfully requests the Court grant his Motion, allow him proceed with this action under a pseudonym, and allow him to file his true name under seal with the Court.

DATED: November 6, 2023

Respectfully submitted,

Case 1:23-cv-12077-WGY Document 11 Filed 11/08/23 Page 2 of 2

Plaintiff's Motion to Proceed Under Pseudonym

John Doe,

By his Attorney,

Ilya I. Feoktistov, Esq.

B.B.O. No. 704458

LAW OFFICE OF ILYA FEOKTISTOV

292 Newbury Street, No. 544

Boston, MA 02115

(617) 462-7938

if@ilyafeoktistov.com

SERVICE CERTIFICATE

I, Ilya Feoktistov, counsel for Plaintiff John Doe in the above-captioned matter, hereby certify that on November 8, 2023, I served a true and accurate copy of the foregoing document on the parties of record by filing electronically and by email on counsel for the University of Massachusetts, the Trustees of the University of Massachusetts, Hannah Monbleau, Kate Legee, Esmeralda Levesque, and Adam Dunbar at:

Michael Hoven, MHoven@umassp.edu

Maria Sheehy, MSheehy@umassp.edu